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Attorneys for Plaintiff Vial and proposed Class Members

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JAIME VIAL, as representative of the heirs
of Rene Correa Borquez and on behalf of
other persons similarly situated,

Plaintiff,

v.

ELIZABETH MAHER MUOIO, in her
official capacity as TREASURER OF THE
STATE OF NEW JERSEY; STEVEN
HARRIS, in his official capacity as
ADMINISTRATOR OF THE STATE OF
NEW JERSEY UNCLAIMED
PROPERTY ADMINISTRATION; and
KELMAR ASSOCIATES, LLC,

Defendants.

Case No.: 3:24-cv-11301

**NOTICE OF MOTION FOR
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

**NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65 and applicable law, Plaintiff Jaime Vial (as legal representative of the heirs of Rene Correa Borquez) hereby moves this Honorable Court, on behalf of himself and all others similarly situated, for a temporary restraining order and a preliminary injunction against Elizabeth Maher Muoio, in her official capacity as Treasurer of the State of New Jersey, Steven Harris, in his official capacity as Administrator of the State of New Jersey Unclaimed Property Administration, and Kelmar Associates, LLC (collectively, “Defendants”), for the reasons stated in the accompanying memorandum and supporting declarations.

Dated: February 3, 2025

Respectfully submitted,

/s/ Kevin P. Roddy

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Attorneys for Plaintiff Vial and Class Members

CERTIFICATE OF SERVICE

I, Kevin P. Roddy, hereby certify that on this 3rd day of February, 2025, I filed the foregoing Notice of Motion for Temporary Restraining Order and Preliminary Injunction with the Clerk of Court using the CM/ECF system, which will effect service on all participating Defendants.

/s/ Kevin P. Roddy

Kevin P. Roddy
Attorney for Plaintiff and Proposed Class Members